

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
CRAIG BRADLEY DEIMLER and :
WILLIAM OLIVER FISHER-DEIMLER, :
FKA WILLIAM OLIVER FISHER, AKA :
WILLIAM OLIVER FISHER DEIMLER, :
Debtors :
: :
JACK N. ZAHAROPOULOS, :
STANDING CHAPTER 13 TRUSTEE, :
Movant :
: :
vs. :
: :
CRAIG BRADLEY DEIMLER and :
WILLIAM OLIVER FISHER-DEIMLER, :
FKA WILLIAM OLIVER FISHER, AKA :
WILLIAM OLIVER FISHER DEIMLER, :
Respondents : CASE NO. 1-20-bk-00841-HWV

TRUSTEE'S OBJECTION TO SEVENTH AMENDED CHAPTER 13 PLAN

AND NOW, this 4th day of April 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, by and through his attorney Douglas R. Roeder, Esquire, and objects to the confirmation of the above-referenced Debtors' Plan for the following reason:

1. Trustee avers that Debtors' Plan is not feasible based upon the following:
 - a. The Plan is ambiguous as to the base amount. More specifically, the total of tier payments from March 2025 to October 2026 should be \$57,200, not \$52,700.

WHEREFORE, Trustee alleges and avers that Debtors' Plan cannot be confirmed, and therefore, Trustee prays that this Honorable Court will:

- a. deny confirmation of Debtors' Plan;
- b. dismiss or convert Debtors' case; and
- c. provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/ Douglas R. Roeder, Esquire
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 4th day of April 2025, I hereby certify that I have served the within Objection by electronically notifying all parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first-class mail, addressed to the following:

Gary J. Imblum, Esquire
Imblum Law Offices, P.C.
4615 Derry Street
Harrisburg, PA 17111

/s/ Derek M. Strouphauer, Paralegal
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee